

As a licensed radio amateur myself (first licensed in 1982, present holder of a general class license) I feel I must respond to this petition (and in doing so, respond as well to the multitude of related petitions now before the Commission.)

First, there is no urgent need for immediate change. Rather than act hastily and regret it later when it is difficult to undo the changes, I urge the Commission to move slowly and with great deliberation on these matters. The United States must continue to provide leadership for the world, rather than simply following meekly in the current trend toward total elimination of a morse testing requirement.

Morse code as a discipline is an integral part of the amateur radio service. The ARRL points out that 30 percent of operators still use CW and Morse on a regular basis. This is a higher percentage than the number who use satellite modes, packet radio, or moonbounce, yet no one has proposed eliminating those topics from the required knowledge base for amateur licensing. As with these other modes, the exposure provided by the licensing requirement continues to lead a certain number of operators to the discovery that they enjoy CW as a mode and can make efficient use of it. Total elimination of the exam element will reduce the number who are actively exposed, which is not necessarily desirable.

In general, I agree with the suggestions made by the petitioner in RM-10811. Merge the technician and technician plus classes into a single class, and grant those licensees access to digital modes in HF subbands, without a code examination element. This is valuable exposure and will increase interest in all digital modes.

Add more technical knowledge, especially about digital modes (which include not only CW, but RTTY, packet, PSK-31, and the 'TOR' modes) to all three examination classes.

I think the present code requirement of 5 words per minute for both general and extra class licensees is sufficient. No useful purpose would be served by attempting to raise the requirement for the extra class as suggested by the petitioner. Those who take an interest in the mode are bound to improve their skill anyway. At the same time, despite repeated claims to the contrary, 5 wpm is not difficult to achieve. Virtually anyone can do it in a couple of weeks if they choose to make the effort.

It is most important that the Commission preserve the digital and CW subband segments, at least for the greater part. Digital modes are expanding (exemplified by the great burst of interest in the amazingly narrow band PSK-31 mode) and if spectrum presently reserved for digital modes (including CW) is opened to phone operation, digital experimenters could easily be squeezed and shouted right out of existence. This must not happen. We must plan for future expansion of all digital modes, including those as yet undeveloped. The majority of the present digital subband spectrum must be retained for those uses.